

UNITED STATES DISTRICT COURT

for the

WESTERN District of TEXAS

United States of America

v.

Homero Zamorano Jr.

Case No. SA-22-MJ- 00966

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of June 27, 2022 in the county of Bexar in the
Western District of Texas, the defendant(s) violated:

*Code Section**Offense Description*

8 U.S.C. § 1324 (a)(1)(A)
(ii)/(B)(iv).

Transportation of illegal aliens resulting in death

PENALTIES: Up to Life in prison or death; up to \$250,000 fine; no
more than 5 years term of supervised release, \$100 Special Assessment,
\$5,000 assessment pursuant to 18 U.S.C. § 3014

This criminal complaint is based on these facts:

See attached affidavit

☒ Continued on the attached sheet.

NESTOR G CANALES Digitally signed by NESTOR G CANALES
Date: 2022.06.28 14:26:21 -05'00'

Complainant's signature

Nestor Canales, Special Agent, HSI

Printed name and title

- ☐ Sworn to before me and signed in my presence.
☒ Sworn to telephonically and signed electronically.

Date: June 28, 2022City and state: San Antonio, Texas

Judge's signature

Elizabeth S. Chestney, U.S. Magistrate Judge

Printed name and title

AFFIDAVIT

Being duly sworn, I declare that the following is true and correct to the best of my knowledge:

On June 27, 2022, Homeland Security Investigations (HSI) San Antonio Special Agents (SAs) responded to the scene of a human smuggling event involving a tractor trailer and sixty-four (64) individuals suspected of being in the United States (U.S.) illegally near Quintana Road in San Antonio, Texas, in the Western District of Texas.

HSI SAs were advised at the scene by San Antonio Police Department (SAPD) officers that they arrived at the location of the tractor trailer after receiving 911 calls from concerned citizens. At the scene, SAPD Officers discovered multiple individuals on the ground and in nearby brush, several of whom were deceased.

SAPD Officers were led to the location of an individual that was observed hiding in the brush before running to abscond from responding citizens. At the location, SAPD officers encountered and detained Homero ZAMORANO Jr. (ZAMORANO Jr.). A cellular phone, a hat, and a wallet containing ZAMORANO Jr.'s identification card was recovered from ZAMORANO Jr. and the immediate area.

ZAMORANO Jr. was escorted to a local hospital for medical evaluation.

Laredo Sector Border Patrol provided HSI SAs surveillance footage of the tractor trailer's immigration checkpoint crossing where the driver can be seen wearing a black shirt with white/grey stripes and a hat. HSI SAs confirmed ZAMORANO Jr. matched the individual from the surveillance footage and was wearing the same clothing.

Responding HSI agents confirmed that forty-eight (48) individuals were deceased and located inside or within the vicinity of the tractor trailer. There were twenty-two (22) Mexican nationals, seven (7) Guatemalan nationals, two (2) Honduran nationals, and seventeen (17) were of unknown origin but suspected to be Undocumented Non-Citizens. HSI confirmed the undocumented status of the deceased individuals at the scene by utilizing a mobile fingerprint device.

Sixteen (16) additional individuals were transported to local hospitals for medical evaluation.

Contact with foreign Consulate offices will be made for proper notifications to family members of the deceased.

Based upon the information set forth above, there is probable cause to believe that ZAMORANO Jr. committed the offense of transportation of illegal aliens resulting in death in violation of Title

8 United State Code, Section 1324(a)(1)(A)(ii)/(B)(iv).

NESTOR G
CANALES

Digitally signed by NESTOR G
CANALES
Date: 2022.06.28 14:27:12
-05'00'

Nestor Canales
Special Agent
Homeland Security Investigations

Subscribed and sworn to telephonically
on June 28, 2022


ELIZABETH S. CHESTNEY
UNITED STATES MAGISTRATE JUDGE